

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

UNITED STATES OF AMERICA

V.

a.k.a.

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a.k.a.

MOHAMMAD ABEDALHAQ (12)

a.k.a. "Mo"

13)

$$(14)$$

a.k.a.

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a.k.a.

$$\dots (16)$$

a.k.a.

**SEALED**

Case No. 4:21-CR-00285

Judge Mazzant

**FILED**

NOV 10 2021

Clerk, U.S. District Court  
Texas Eastern

**FIRST SUPERSEDING INDICTMENT**

THE UNITED STATES GRAND JURY CHARGES:

**Count One**

Violation: 21 U.S.C. § 846 (Conspiracy to Possess with the Intent to Distribute Marijuana)

That from sometime in or about August 2021, and continuously thereafter up to and including the date of this First Superseding indictment, in the Eastern District of Texas and elsewhere, [REDACTED] [REDACTED] [REDACTED] a.k.a. [REDACTED] [REDACTED] a.k.a. [REDACTED] [REDACTED] [REDACTED] defendants, did knowingly and intentionally combine, conspire, and agree with each other and persons known and unknown to the United States Grand Jury, to knowingly and intentionally distribute and possess with the intent to distribute 1,000 kilograms or more of a mixture or substance containing a detectable amount marijuana, in violation of 21 U.S.C. § 841(a)(1).

In violation of 21 U.S.C. § 846.

**Count Two**

Violation: Violation of 18 U.S.C. § 924(c) (Possession of a Firearm in Furtherance of a Drug Trafficking Crime)

On or about September 28, 2021, in Carrollton, Texas, a location within the Eastern District of Texas, [REDACTED] defendant, did knowingly possess firearms, namely, a Capital Armament CO, LLC Multi Caliber Rifle, Model #BCA15, Colt 38 Super Caliber Pistol, Model #Government, Serial #ELCEN10786,

Ruger 57 Caliber Pistol, Model # Ruger 57, Serial #641-27575, in furtherance of a drug trafficking crime for which he may be prosecuted in a Court of the United States, to wit: conspiracy to intentionally distribute and possess with the intent to distribute a mixture or substance containing a detectible amount of marijuana.

In violation of 18 U.S.C. § 924(c).

**Count Three**

Violation: Violation of 18 U.S.C. § 924(c) (Possession of a Firearm in Furtherance of a Drug Trafficking Crime)

On or about September 23, 2021, in Dallas, Texas, a location within the Northern District of Texas, [REDACTED] and [REDACTED] [REDACTED] defendants, did knowingly possess firearms, namely, a Glock 40 Caliber Pistol, Model #27, Serial #BXR087US, a Girsan 45 Caliber Pistol, Model #MC1911, Serial #T6368-19AA00026, a Glock 40 Caliber Pistol, Model 22Gen4, Serial #WDM965, a Romarm-CUGIR 762 Caliber Pistol, Model # Draco, Serial #DR-2655-09, in furtherance of a drug trafficking crime for which they may be prosecuted in a Court of the United States, to wit: conspiracy to intentionally distribute and possess with the intent to distribute a mixture or substance containing a detectible amount of marijuana.

In violation of 18 U.S.C. § 924(c).

**Count Four**

Violation: 21 U.S.C. § 846 (Conspiracy to Distribute and Possess with the Intent to Distribute a Controlled Substance (Fentanyl))

That from sometime in or about August 2021, and continuously thereafter up to and including the date of this First Superseding indictment, in the Eastern District of

Texas and elsewhere, [REDACTED] a.k.a. [REDACTED] [REDACTED]

[REDACTED] a.k.a. [REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] a.k.a. [REDACTED] a.k.a.

[REDACTED] [REDACTED] a.k.a. [REDACTED] [REDACTED] a.k.a. [REDACTED]

[REDACTED] **MOHAMMAD ABEDALHAQ**, a.k.a. "Mo", [REDACTED]

[REDACTED] [REDACTED] a.k.a. [REDACTED] [REDACTED] a.k.a.

[REDACTED] and [REDACTED] a.k.a. [REDACTED] defendants, did

knowingly and intentionally combine, conspire, and agree with each other and persons known and unknown to the United States Grand Jury, to knowingly and intentionally distribute and possess with the intent to distribute 400 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl]propanamide (Fentanyl), in violation of 21 U.S.C. § 841(a)(1).

In violation of 21 U.S.C. § 846.

### **Count Five**

Violation: 18 U.S.C. § 1956(h)  
1956(a)(2)(A) and (a)(2)(B)(i)  
(Conspiracy to Commit Money  
Laundering)

That from sometime in or about August 2021, and continuing thereafter up to and including the date of this First Superseding Indictment, in the Eastern District of Texas, and elsewhere, [REDACTED] [REDACTED]

MOHAMMAD ABEDALHAQ, a.k.a. "Mo", [REDACTED] a.k.a.

[REDACTED] defendants, did knowingly combine, conspire, and agree together and with each other and with other persons known and unknown to conduct financial transactions affecting interstate commerce which involved the proceeds of specified unlawful activity, that is conspiracy to distribute and possess with intent to distribute Fentanyl, as alleged in Count One of this First Superseding Indictment;

1. knowing that the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership and control of the proceeds of that specified unlawful activity contrary to 18 U.S.C. § 1956(a)(B)(i);

2. did knowingly transport, transmit, or transfer, or attempt to transport, transmit, or transfer a monetary instrument or funds from a place in the United States to or through a place outside the United States, or to a place in the United States from or through a place outside the United States, with intent to promote the carrying on of specified unlawful activity, that is, Conspiracy to Possess with the Intent to Distribute a Controlled Substance, to-wit: Fentanyl, as described in Count One of this First Superseding Indictment, in violation of 18 U.S.C.

§ 1956(a)(2)(A); and

3. did knowingly transport, transmit, or transfer, or attempt to transport, transmit, or transfer a monetary instrument or funds from a place in the United States to or through a place outside the United States, or to a place in the United States from or through a place outside the United States, involving the proceeds of a specified unlawful activity, that is, Conspiracy to Possess with the Intent to Distribute a Controlled Substances, to-wit: Fentanyl, as described in Count One of this First Superseding Indictment, knowing that the monetary instrument or funds involved in the transportation, transmission, or transfer represented the proceeds of some form of

unlawful activity and knowing that such transportation, transmission, or transfer was designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of the specified unlawful activity, in violation of 18 U.S.C. § 1956(a)(2)(B)(i).

All in violation of 18 U.S.C. § 1956(h).

**NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE**

From their engagement in the violation alleged in this Indictment, the defendants shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d), 18 U.S.C. § 982 and 21 U.S.C. § 853, all property used to commit or facilitate the offenses, proceeds from the offenses, and property derived from proceeds obtained directly or indirectly from the offenses, including but not limited to the following:

- a. Capital Armament CO, LLC Multi Caliber Rifle, Model #BCA15, Serial #BR10126, seized from [REDACTED]
- b. Colt 38 Super Caliber Pistol, Model #Government, Serial #ELCEN10786, seized from [REDACTED]
- c. Ruger 57 Caliber Pistol, Model # Ruger 57, Serial #641-27575, seized from [REDACTED]
- d. Glock 40 Caliber Pistol, Model #27, Serial #BXR087US, seized from Jesus Gallegos and Isidro Gallegos;
- e. Girsan 45 Caliber Pistol, Model #MC1911, Serial #T6368-19AA00026, seized from Jesus Gallegos and Isidro Gallegos;
- f. Glock 40 Caliber Pistol, Model 22Gen4, Serial #WDM965, seized from Jesus Gallegos and Isidro Gallegos;
- g. Romarm-CUGIR 762 Caliber Pistol, Model # Draco, Serial #DR-2655-09, seized from Jesus Gallegos and Isidro Gallegos.

The United States of America shall be entitled to forfeiture of substitute property under the provisions of 21 U.S.C. § 853(p), and as incorporated by 28 U.S.C. § 2461(c).

A TRUE BILL,

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GRAND JURY FOREPERSON

NICHOLAS J. GANJEI  
Acting United States Attorney

By:

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COLLEEN BLOSS  
Assistant United States Attorney

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FOR THE EASTERN DISTRICT OF TEXAS  
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## NOTICE OF PENALTY

## Count One

Violation: 21 U.S.C. § 846

Penalty: If 1,000 kilograms or more of a mixture or substance containing a detectable amount of marijuana -- not less than 10 years and not more than life imprisonment, a fine not to exceed \$10 million, or both; supervised release of at least five years.

Special Assessment: \$100.00



**Count Two**

Violation: 18 U.S.C. § 924(c)

Penalty: Imprisonment for not less than five years to be served consecutive with any other term; a fine not to exceed \$250,000, or both; a term of supervised release of not more than five years.

Special Assessment: \$100.00

**Count Three**

Violation: 18 U.S.C. § 924(c)

Penalty: Imprisonment for not less than five years to be served consecutive with any other term; a fine not to exceed \$250,000, or both; a term of supervised release of not more than five years.

Special Assessment: \$100.00

**Count Four**

Violation: 21 U.S.C. § 846

Penalty: If 400 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (Fentanyl) – A term of imprisonment of not less than 10 years and not more than life imprisonment, a fine not to exceed \$10 million, or both; supervised release of at least five years.

If more than 40 grams but less than 400 grams of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (Fentanyl) – A term of imprisonment of not less than 5 years but not more than 40 years, a fine not to exceed \$5 million, or both; supervised release of at least four years.

If less than 40 grams of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (Fentanyl) -- A term of imprisonment of not more than 20 years imprisonment, a fine not to exceed \$1,000,000.00 or both; supervised release of at least three years.

Special Assessment: \$100.00

**Count Five**

Violation: 18 U.S.C. § 1956(h) in violation of 18 U.S.C. §§ 1956(a)(1)(A)(i), 1956(a)(1)(B)(i), 1956(a)(2)(A), 1956(a)(2)(B)(i), and 1957

Penalty: Not more than 20 years imprisonment; a fine not to exceed \$500,000 or twice the pecuniary gain or loss. A term of supervised release of not more than 3 years.

Special Assessment: \$100.00